

PC SCAN

(If you need additional space for ANY section, please attach an additional sheet and reference that section.)

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8/23/2018

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

PC9

James Lee Dorsey

1:18-CV-5772

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

JUDGE WOOD
MAGISTRATE JUDGE GILBERT

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

Michelle Williams,

Sgt: Taylor

Sgt: Dethrow

Lt: Bishop

Lt: Jacobs

MAJOR: Lake

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAMES W. DORSEY

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

KAREN RABIDEAU

MR. STARKY

RANDY P. LISTER (WARDEN)

John Baldwin -

I.O.U.C. Director

John Doris (1,283)

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

 COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

 OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

(3)

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

I. Plaintiff(s):

- A. Name: JAMES Lee DORSEY
- B. List all aliases: L.P. LITTLE PATTER
- C. Prisoner identification number: RO3996
- D. Place of present confinement: STATEVILLE CORR. CENTER
- E. Address: P.O. Box-112 - Juliet, AL 36034

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Michelle Williams
 Title: Correctional Officer
 Place of Employment: Stateville Correctional Center
- B. Defendant: Sgt. Taylor
 Title: Sergeant
 Place of Employment: Stateville Corr. Center
- C. Defendant: Ms. Bishop
 Title: Lieutenant
 Place of Employment: Stateville Corr. Center

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

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D. Defendant: MR. JACOBS

TITLE: Lieutenant

Place of employment: Stateville CORR. Center

E. Defendant: MR. DETHROW

TITLE: Sergeant

Place of employment: Stateville CORR. Center

F. Defendant: MR. STARKY

TITLE: Internal Affairs Officer

Place of employment: Stateville CORR. Center

G. Defendant: MR. LAKE

TITLE: MAJOR / Correctional Officer

Place of employment: Stateville CORR. Center

H. Defendant: KAREN RABIDEAU

TITLE: Placement Officer

Place of employment: Stateville CORR. Center

I. Defendant: WARDEN: Randy Pfister

TITLE: WARDEN

Place of employment: Stateville CORR. Center

J. Defendant: MR. John Baldwin

TITLE: Acting Director of I.D.O.C.

Place of employment: Springfield, Ill

(5)

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: DORSEY V. MITCHELL
CASE NO. 18C525
- B. Approximate date of filing lawsuit: JANUARY of 2018
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: JAMES W. DORSEY A.K.A. L.P. A.K.A.
LITTLE PATTIE
- D. List all defendants: Dentist: Jaqueleine Mitchell
Dental ASST: Cristal Luce
ORAL Surgeon: DR. CRAIG
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. Dist. Ct. of Court: Northern Dist. of Ill.
- F. Name of judge to whom case was assigned: ANDREA B. WOODS
- G. Basic claim made: Deliberate Indifference to A
SERIOUS MEDICAL NEED
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Pending
- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

- (J) NAME of case and Docket number: DORSEY V. O'BRIEN
- (1) CASE No. 16-CV-7884: (pending)
- (2) Date of filing lawsuit: MARCH of 2016
- (K) NAME of case and Docket number: DORSEY V. WASHINGTON
- (1) CASE No. 14-CV-7627:
- (2) Date of filing lawsuit: September of 2014
- (8) list all plaintiffs: James Lee Dorsey
- (9) list all Defendants: Timothy Washington
- (5) Court in which lawsuit was filed: U.S. District Court: Northern District of Ill.
- (6) name of Judge: MATTHEW F. KENNELLY
- (7) Basic claim made: Deliberate Indifference to my safety: (pending)
- (L) NAME of case and Docket number: DORSEY V. TERRY WILLIAMS et al: CASE No. 15-CV-876
- (1) Date of filing: AUGUST of 2015
- (2) list all plaintiffs: JAMES Lee DORSEY
- (3) list all Defendants: TERRY WILLIAMS, DANIEL AARTI ANNA MERZEE, LEROY BARKS, JILL HOSSELTON, JERRY BALDWIN
- (4) Court in which lawsuit was filed: U.S. District Court: Northern District of Ill.
- (5) Basic claim made: Retaliation
- (6) name of Judge: MATTHEW F. KENNELLY
- (7) Disposition of case: pending

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① name of case and Docket number: Dorsey v. Ghosh
CASE NO: 13 C 5747

② approximate Date of filing: September of 2013

③ list all plaintiffs: JAMES W DORSEY

④ list all Defendants: MARCUS HARDY, MICHAEL HATKE
DR. GHOSH, DR. CARTER, DR. SHAEFER, DR. ORGISI,
P. A. WILLIAMS

⑤ Court in which lawsuit was filed: U.S. District
Court: Northern Dist. of Ill.

⑥ name of Judge: ANDREA R. WOOD

⑦ Basic claim made: Deliberate indifference to
my serious medical needs

⑧ Disposition of case: Pending

① name of case and Docket number: Dorsey v. KATZ
CASE NO. 99-CV-7745

② approximate Date of filing: N/A

③ list all plaintiffs: JAMES W DORSEY

④ list all Defendants: STUART KATZ

⑤ Court in which lawsuit was filed: U.S. District
Court: Northern Dist. of Ill.

⑥ name of Judge: N/A

⑦ Basic claim made: N/A

⑧ Disposition of case: Dismissed

- ① Name of case and Docket number: Dorsey v. Cook County Dept: of Corrections: Case No: 04-cv-897
- ② Approximate Date of filing: N/A
- ③ List All Plaintiffs: James W Dorsey
- ④ List All Defendants: Cook County Dept: of Corrections.
- ⑤ Court in which lawsuit was filed: U.S. District Court: Northern Dist: of Ill.
- ⑥ Name of Judge: N/A
- ⑦ Basic claim made: N/A
- ⑧ Disposition of case: Dismissed
- ⑨ End:

Statement of Claim

Plaintiff: James Lee Dorsey #1203996

an inmate at stateville CORR. Center

Since (2009) Brings this 1983 U.S.C. Civil
Suit Against the following stateville CORR. Centers
staff:

- ① Correctional officer: Michelle Williams ② Sgt. Taylor
- ③ Sgt. Deth Row ④ Lt. MS. Bishop ⑤ Lt. Jacobs
- ⑥ Internal Affairs Officer: Mr. Starky ⑦ Major Lake
- ⑧ Placement Officer: Karen Rabideau ⑨ Warden:
Randy Plister ⑩ F.D.O.C Director John Baldwin
(For)

- 1 Retaliation
- 2 Deliberate Indifference to my safety
- 3 Malicious & Sadistic Conduct
- 4 Campaign of Harassment
- 5 Discrimination against Americans with Disabilities
- 6 Intentional Infliction of Emotional Distress
- ⑦ Collusion

(1st, 8th and 14th Amendment)

-Deprivations-

(Each named Defendant at all times acted
under color of state law and in their
individual and official capacities.)

(Dejected Conduct)

Plaintiff has repeatedly exercised His 1st Amendment Const. Right to file Grievances and Civil Suits Prior to (9/8/16)

(Motivating Factors)

Plaintiff at the Time prior to 9/8/16, Had (4) Civil Suits pending Against Stateville C.C.'s Staff: And Had Filed over 50 Grievances Against multiple Stateville Staff Members.

Facts

(A)

(Correctional officer: Michelle Williams)

- (1) on 9/8/16: plaintiff was housed in cell 139 AT Stateville C.C.'s (Delta House)
- (2) Cell 139 sits directly in front of the enter lock maybe 10-15 feet away.
- (3) C/O: Ms. Williams was the Door officer and has the key for C12 Gallery.
- (4) Plaintiff informed C/O: Williams that he had a medical pass for 1:20 p.m. Note: plaintiff is in cell (139) directly in front of the door and only several feet away from C/O: Williams

- ⑤ C/O: Williams Refuses To let plaintiff out For His Medical Appointment. C/O: Williams states "So what"
- ⑥ C/O: Williams then walks Directly in front of Cell (139). then starts a conversation with Lt. Bishop and C/O: Brown
- ⑦ plaintiff then call out to Lt. Bishop informing Her, that He HAS a medical appointment. Lt. Bishop says. SGT: TAYLOR Has the key:
- ⑧ Sgt: Taylor. at the time was on A Higher Gallery -
- ⑨ SGT: Taylor then Comes Down to (1) Gallery about (10) minutes later, He then Joins the on going conversation, Between Lt. Bishop, C/O: Brown and C/O: Williams;
- ⑩ plaintiff then calls out to Sgt: Taylor (3) Times He ignores plaintiff, plaintiff yells, I HAVE a medical appointment, SGT: Taylor states MS. Williams Has the key For (1) Gallery
- ⑪ plaintiff states to SGT: Taylor: C/O: Williams is Refusing to let me out For my medical appointment.
- ⑫ plaintiff is then ATTACKED Verbally By MS. Williams in front of staff and numerous inmates. stating the following:
 - ① Dorsey you're a snitch!
 - ② You Tell, every thing!

- ③ You Can't Hold Water!
- ④ You, Snitch!
- ⑤ Mother fuckers Be Sung For stupid shit.
- ⑥ we can't stand, fuck ASS!
- ⑦ I'm going to beat your ASS.

- (B) -

⑬ 9/9/16? plaintiff Files Grievance And Formal Complaint Against C/O: Williams: Lt. Bishop, Sgt: Taylor and C/O: Brown

⑭ Lt. Bishop At all Times Was the assigned lieutenant of Delta and oversaw the Daily operations of Delta House and is Responsible For the Safety of Both Staff and Inmates. on Her Watch, Lt. Bishop Facilitated, Condoned and turned a Blind eye To the Actions at C/O: Williams and Gave false statements concerning the Conduct of C/O: Williams Against plaintiff;

⑮ Sgt: Taylor: Was the assigned Sgt: and runs the Daily operations of Delta House and is Responsible For the Safety of Both Staff and Inmates under His Watch, Facilitated Condoned and turned a Blind eye To the Conduct at C/O: Williams Against plaintiff And Gave false statements concerning the Conduct at C/O: Williams

(C)

(Chronological events of Retaliation)

- (16) 9/22/16: Plaintiff is interviewed by Internal Affairs officer, Mr. Starky: (Starky's mind was already made up).
- (17) Plaintiff is MET with Hostility, Prejudice, and a strong Bias from Mr. Starky:
- (18) Plaintiff is called a Gang Banger, Starky made it clear to plaintiff that he was not going to take my word over his officers, He called me a trouble maker, He was extremely partial.
- (19) Starky: Facilitated, Condoned and Turned a Blind eye to the Conduct of C/O Williams on 9/8/16

(D)

(9/23/16)

20. Plaintiff is on the special needs yard, for about an hour.
21. Plaintiff is then approached by C/O: Facer: Facer tells plaintiff, Dorsey you are going back to the cell house to pack your property, you're moving to Bravo House.
22. Plaintiff is then escorted back to Delta House.
23. As C/O: Facer escorts plaintiff to Delta house C/O: Facer states to plaintiff, Dorsey I had nothing to do with this, they say you are a troublemaker

And they want all trouble makers out of the cell house?

(24) plaintiff asks c/o: Facen who says I'm a trouble maker, Facen states Lt. Bishop, Sgt. Taylor and c/o: Mrs. Williams, don't like you because of the grievances and lawsuits, you have against staff.

(25) c/o: Facen further states to plaintiff, c/o: Mrs. Williams is major: takes (Btcl). Even if she's wrong, she will always be right, in his eyes!

(26) c/o: Facen states to plaintiff as we are entering Delta house, Dorsey "Please" don't mention my name I will be leaving stateville soon, and be careful.

(27) plaintiff is then kicked out of Delta House. When he has been housed since (2009) and was a low aggression cell house, plaintiff is placed in Bravo House, Bravo House was known for a lot of gang activity and plaintiff had numerous enemies in Bravo House.

(E)

(Placement officer: Karen RABIDEAU)

(28) Karen RABIDEAU, is the sole placement officer. SHE controls what cell's ^{Inmates} VAXE moved into, and with whom.

- (29) Brief History of plaintiff's Relationship with Karen RABIDEAU. MS. RABIDEAU, Has shown nothing But Disdain For plaintiff Due to pending Civil suits, and Grievances Filed Against Her and Her Colleagues, plaintiff Had several Grievances Against MS. RABIDEAU Because she Continued To place plaintiff in the cell with (S.F.G) members, That she was Aware were enemies of plaintiff.
- (30) 9/23/16: plaintiff was placed in cell (228) in BRAVO House, This cell was infested with RACHES and spiders;
- (31) 9/28/16: placement officer: KAREN RABIDEAU maliciously places: Inmate: LEE CRATION # N53789 in cell with plaintiff.
- (32) AS Inmate: LEE CRATION, was moving into cell 228 with plaintiff: BRAVO House: SGT: DETHROW states MS. RABIDEAU, Must Have you on Her "SHIT list" This Guy is Trouble: DORSEY you will not be able to live with Him: Inmate: CRATION Had a History of ASSAULTS and was EXTREMELY UNSTABLE.

(6)

(Actions of Inmate: CRATION in cell (228))

- ① slammed T.V. on the floor from the Top Bunk.
- ② would urinate on the Floor and on the Toilet, Each time plaintiff, cleaned cell.

- ③ Walk stand over plaintiff and pace the floor at (1-3 A.M.) as plaintiff attempted to sleep.
- ④ Would refuse to step aside as plaintiff attempted to walk pass.
- ⑤ stated often that He (Cration) did not care about dying in jail, and He didn't care about killing some one else.
- ⑥. stated often, that He was a Gang Chief.
- ⑦ Inmate: (Cration) would Bounce up and Down on His Bunk repeatedly as plaintiff attempted to sleep.
- ⑧. plaintiff: witnessed a Heated verbal Confrontation Between, Inmate: Cration and: Sgt: Dethrow Because of the BARBERSHOP list: Cration Threatened To Have Sgt: Dethrow family killed.
- ⑨. plaintiff: immediately Request To be separated From Cration:

(H)

- (33) on or about 10/15/16: Plaintiff speaks to Sgt: Dethrow, plaintiff pleads with Sgt: Dethrow To separate him and Cration: Sgt: Dethrow states there is nothing He could Do.

- (34) Several Days later plaintiff Request that Sgt: Dethrow Intervene, and move plaintiff out of cell (228). He refused.
- (35) Plaintiff: Then asks For a Crisis Team. Sgt: Dethrow, states Lt. JACOBS is a Crisis team member. Plaintiff Request To speak with Lt. JACOBS.
- (36) Maybe an Hour later: Sgt: Dethrow states to plaintiff, that Lt. JACOBS Does not want To talk to you. He further states to plaintiff: (You know why)

(I)

(protected conduct)

- (37) Plaintiff: Has Filed Several Grievances since Being kicked out of Delta House on 9/8/16. Grievances: Dated, 9/8/16: 9/23/16/ 9/28/16 10/10/16: on 10/18/16: Plaintiff sent Complaint About staff conduct To I.D.O.C.: Director. Mr John Baldwin:

(J)

- (38) on 11/10/16: The staff at stateville. C.C. Attempts To have plaintiff Transferred To Menard, C.C.
- (39) Plaintiff: ask Sgt: Dethrow yet again For a Crisis team.

(40) Lt. Jacobs, again refuses to speak to plaintiff.

(41) In the staff haste to get rid of plaintiff they could not get plaintiff's medical hold lifted.

K

(11/13/16)

(42) on or about 11/13/16: Plaintiff relative Martinez Nelson; who has come to visit plaintiff during plaintiff's entire incarceration is approach by (3) stateville c.c.s staff members: (2) correctional officers (1) lieutenant or manager: (John Doe), detain and interrogate Martinez Nelson; ask Mr. Nelson multiple questions about plaintiff; then question Mr. Nelson about his relationship with plaintiff. Note: Plaintiff has been incarcerated since May 12, 1998, my family has never been harassed.

(L)

(43) on 11/18/16: Plaintiff files an emergency injunction against I.P.O.C. Director John Baldwin; Warden: Randy Plister and placement officer: Karen Rabideau.

(M)

- (44) on 11/28/16: Plaintiff receives order by mail from THE HONORABLE: MATTHEW F. KENNEDY: Concerning Emergency Injunction Filed by plaintiff. Note: Before plaintiff receives response to (911) Injunction Filed on 11/18/16: it is held by stateville staff for (4-5) days, before plaintiff receives it.

(N)

- (45) on or about: 11/28/16: plaintiff again approaches Sgt. Dethrow about getting separated from inmate-cration, due to the severe emotional stress. Sgt. Dethrow, tells plaintiff, to write down exactly what is going on in the cell and he will give the letter to Lt. Jacobs

- O -

(12/1/16)

- (46) on 12/1/16: plaintiff leaves stateville, c.c. to go on criminal court writ, at approximately (5:45 AM) Plaintiff: Gives inmate John Doe a sealed envelope to give to Sgt. Dethrow.
- (47) As plaintiff is on criminal court writ, both Sgt. Dethrow and Lt. Jacobs: maliciously gives letter to Internal Affairs.

(48) upon returning from criminal court writ, plaintiff passes Lt. JACOBS at Gate (5) during shift change at approximately 2:30-3:00 p.m.

(49) as Lt. JACOBS passes, plaintiff Lt. JACOBS glares at plaintiff (I got you) He states.

(50) plaintiff then returns to Bravo House, and is immediately stopped by (3-11 Shift) Sgt. Grant, who states to plaintiff: look Dorsey, I do not have anything to do with this, and I don't have anything against you. But you are going to Segregation. I don't know what for.

(51) Plaintiff is stripped of all personal property and then placed in Stateville C.C. X-House which is extremely isolated and without a hearing.

(P)

(52) Plaintiff then files multiple grievances concerning the illegal Segregation Confinement: 12/1/16 12/2/16 - 12/6/16 - 12/18/16 are the dates that plaintiff filed grievances requesting immediate release from (Seg).

- (1) -

(53) on 12/20/16: Plaintiff was finally interviewed by Internal Affairs officer: JABORAK: who states to Plaintiff, that his Boss, Mr. Starky had plaintiff placed in (Segregation)

(R)

(False and manipulated Disciplinary Report)

(54) THE DISCIPLINARY REPORT WAS BASED ON A LETTER OF "CRISIS", WRITTEN BY PLAINTIFF, ASKING FOR "IMMEDIATE" INTERVENTION. THE LETTER WAS ALTERED AND MANIPULATED BY INTERNAL AFFAIRS INVESTIGATOR: MR. STARKY. THIS RETALIATORY CONDUCT CAUSED PLAINTIFF A SIGNIFICANT ATYPICAL HARDSHIP.

(S)

(MAJOR: LAKE)

(55) at all times acted under color of state law and in his individual and official capacity when he facilitated, condoned and turned a blind eye, to the on going Retaliatory Conduct of all mentioned Defendants and willfully participated in the on going Deprivations by signing the False and Fabricated: Disciplinary Report on 12/20/16.

(+)

(Warden: Randy Pfister)

(56) Was the Warden: at all Times Relevant and acted under color of state law and in his official and individual capacity: is the chief administrative officer for Stateville, C.C. Has condoned and participated in the ongoing Deprivations and Failed to prevent known Civil Rights Deprivations against plaintiff: Warden: Pfister within his supervision had the authority to correct the wrong done to plaintiff.

(U)

(57) (I.O.O.C. Director: John Baldwin)

at all Times acted under color of state law and in his official capacity had complete authority to intervene: However he turned a blind eye condone and facilitated each Deprivation inflicted upon plaintiff.

(V)

(Americans with Disabilities Discrimination)

(58) Plaintiff Suffers from the following Disabilities (physical)

- ① Blind in Right eye
- ② Walks with aid of crutch
- ③ Has Osteoarthritis

- (4) DEGENERATIVE DISC DISEASE
- (5) NEURAPATHY
- (6) SEVERAL BULGING DISCS
- (7) HYPERTENSION
- (8) SEVERE SPINAL STENOSIS
- (9) SEVERE ARTHRITIS IN RIGHT KNEE
- (10) MENTAL DISABILITIES
- (11) PLAINIFF IS BIPOLAR
- (12) POST TRAUMATIC STRESS DISORDER
- (13) ANXIETY ATTACKS
- (14) SEVERE PANICK ATTACKS
- (15) DEPRESSION

(W)

(RE CRIMINATION)

- (59) PLAINIFF: GRANTING AND CIVILIZERS ARE CONSTITUTIONALLY PROTECTED SPEECH UNDER THE SPEECH AND PETITION CLAUSES OF THE 1ST AMENDMENT. A PRISONER IS ENTITLED TO TAKE ADVANTAGE OF GRIEVANCE PROCEDURES, WITHOUT FEAR OF RECRIMINATION AND IF A OFFICIAL RETALIATES AGAINST THE PRISONER FOR MAKING NON-FRIVOLOUS CLAIMS, THE OFFICIAL VIOLATES INMATES 1ST AMEND. RIGHTS:

(X)
(Prayer for Relief)

- ① Compensatory Damages
- ② punitive Damages
- ③ Injunctive Relief
- ④ Attorney fees and Costs, and any other relief the Court Deems, proper.

Respectfully, submitted
James Le Dorsey -
FID.# R039961 Stateville.
CIC P.O. Box 712
Julesburg, CO 80434

(25)

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

plaintiff seeks relief for (1) Retention (2) Deliberate indifference to my safety (3) Campaign of Harassment (4) A.D.A. Discrimination (5) Intentional Infliction of Emotional Distress (6) Malicious and Sadistic Conduct (7) Collusion: 1st, 14th and 8th Amendment; Dependent plaintiff seeks punitive, compensatory damages, and injunctive relief; attorney fees and costs, and other relief the court deems proper.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 6th day of August, 2018

James Lee Dorsey
(Signature of plaintiff or plaintiffs)

JAMES LEE DORSEY
(Print name)

R03996
(I.D. Number)

Stateville Correctional Center P.O. Box-112

Juliet, Ill. 60434
(Address)

IN THE
United States District Court
For the Northern Dist. of Ill, Eastern Division

James Lee Dorsey
Plaintiff/Petitioner

Vs.

No. _____

Defendant/Respondent

PROOF/CERTIFICATE OF SERVICE

TO: Clerk of the U.S
Court House: 219 S. Dearborn
Chicago, IL 60604

TO: _____

PLEASE TAKE NOTICE that on August 16th 2018, I placed the attached or enclosed documents in the institutional mail - E-Filed at Stateville Correctional Center, properly addressed to the parties listed above for mailing through the United States Postal Service

DATED: 8/16/18

Is: James Lee Dorsey
Name: JAMES LEE DORSEY
IDOC#: RO 3986
Address: Stateville Corr Center
219 S. Dearborn
Chicago, IL 60604
PO Box 112



Subscribed and sworn to before me this 16 day of August 20 18

[Signature]
Notary Public